CLOSURE OF UNDERGROUND TANKS.

The Union Switch & Signal Division of American Standard removed thirty five (35) tanks at it's Swissvale Property. The Project was conducted in two (2) phases.

The first phase was the removal, cleaning, and disposal of (19) Steel Storage Tanks. This work was further broken down into three areas.

- 1. Five (5) 20,000 gallon #2 Fuel 0il Tanks
- 2. Two (2) Gasoline tanks; 10,000 and 1,000 gallons
- 3. Twelve (12) Process Oil Tanks

Work began on the five (5) 20,000 Gallon #2 Fuel
Oil Tanks on December 9, 1985. New England Pollution Control
Co., Inc. (NEPCCO) performed the excavation work.

The soil overlying the tanks was first excavated and stockpiled on plastic. NEPCCO personnel then entered the tanks to remove any residual product and to pressure wash them. The tanks were exhumed and placed on plastic where a hole was burned in each to certify that they had been cleaned. They were then cut up and disposed of offsite as scrap. Similar procedures were used with respect to all (19) tanks.

After exhumation, composite samples were taken from the excavation. These samples were sent to the International Technologies Labs in Export, Pennsylvania for Total Petroleum Hydrocarbon (TPH) Analysis.

There were four composite samples taken around the excavation. They were labeled P-1 Southwest Corner, P-2 Northwest Corner, P-3 Southeast Corner, and P-4 Northeast Corner. The results were as follows:

P-1	340 ррш	TPH
P-2	140 ppm	TPH
P-3	260 ppm	TPH
P-4	53/41 ppm	TPH

The excavated soil was placed back in the excavation along with the overlying soil. The reintroduced soil was permitted to settle and then was rolled and the site was closed on December 12, 1985.

Two gasoline tanks, one 10,000 gallons and the second 1,000 gallons were removed from area two on December 12, 1985.

Composite samples were taken from the North,

South, East, and West sides, of the excavation. These
samples were labeled P-5, P-6, P-7, and P-8. The results
are as follows:

P-5	62	ppm	TPH
P-6	82	ppm	TPH
P-7	110	ppm	TPH
P-8	84	שממ	TPH

In addition to the four samples sent to the I.T. Labs, one composite sample was taken from the four sides of the excavation, sent to Intech Biolabs, 158 Tides Lane, East Brunswick, New Jersey 08816, and analysed for TPH The analysis indicated 20 ppm TPH.

The soil was placed back into the excavation and work was completed on December 12, 1985.

The work on the third area containing twelve (12) process oil tanks began December 13, 1985.

Four composite samples from the excavation were taken and labeled P-9, P-10, P-11, and P-12 and sent to the I.T. Labs for TPH Analysis. The results were as follows:

P-9	20	ppm	TPH
P-10	4 5	ppm	ТРН
P-11	11	ррm	TPH
P-12	11	ppm	TPH

In addition to the TPH Analysis done by I.T. Labs

ne composite sample was analyzed for P C B 's by Intech Biolabs.

No P C B 's were found. The excavation was closed December 16,

1985. 967 gallons of residual product and rinsate from the

pressure washing of all (19) steel storage tanks were disposed

of as a Waste Flammable Liquid, N.O.S., Flammable Liquid U.N.

1993 at Standard Tank Corporation's Bayonne, New Jersey facility,

(ref.Exhibit 4.1 State of New Jersey Manifest Number NJA0099283

attached).

The second phase of the closure of underground tanks project was the removal and disposal of fifteen (15) concrete vaults, whose total capacity was 306,000 gallons. First, of 200,000 gallons of non-hazardous flyash slurry was removed from the vaults, dewatered using the Waste Treatment Plant Filter Press and drummed for disposal. This work was performed during January through April, 1986.

The drums of flyash were transported to Michigan Disposal, Inc. in Belleville, Michigan for disposal (ref. Exhibit 4.2 Michigan State Manifest Numbers 0797208, 0821705, and 0797209) on May 8, 1986 by Buffalo Fuels Corporation.

I. T. Corporation began work on the demolition and removal portion of the project on April 22, 1986 following removal of the flyash. Prior to demolition of the vaults, hydroblasting was performed to remove any residues from the vaults interior. The rinsate from the hydroblating was processed through the plant's Wastewater Treatment Plant.

The concrete was completely demolished and staged at the north end of the excavation by May 6, 1986. On May 8, 1986, (21) soil samples from beneath the slab were analyzed for TPH. Results from these samples range from 270 ppm to 4,600 ppm. TPH (ref. Exhibit 4.3 "Table #1"). On May 13, 1986, (18) additional soil samples and one water sample were taken from around the perimeter of the excavation.

Analysis showed the water sample to be clean (ref. Exhibit 4.4 Table #2). The additional soil sample results taken from the perimeter ranged from 12 ppm to 9,000 ppm TPH (ref.Exhibit 4.5."Table #3"). A PCB composite sample was also taken and results showed no PCB's present (ref. Exhibit 4.6 "Table #4).

On May 15, 1986, I.T. Corporation removed soil to a depth of six feet under the bottom of the slab and out to the boundaries of the excavation. This soil was staged at the South end of the excavation. The filling of the excavation began on May 29, 1986, with fill material being supplied by Kennedy Contracting Company, Pittsburgh, PA, and was completed August 30, 1986.

From July 28, 1986 to August 7, 1986 approximately

1,500 tons of concrete, rebars, and soil which was used to line
the truck beds were tansported to Suburban Landfish Newark,

Ohio for disposal as a Non-Hazardous Waste. (ref. Exhibit 4.7

Ohio EPA Solid Waste Disposal Questionnarie 5-29-86 and

Ohio EPA letter 6-30-86).

Remaining unused soil was spread to a thickness of less than one foot. The soil was fertilized with a high nitrogen content fertilizer to promote biodegradation. Hydrocarbon concentrations in the soils were decreased significantly as aeration and tilling of the material was performed. Additional samples were taken of the spread soil on August 15, 1986, March 25, 1987, and June 26, 1987. The results are as follows:

August 15, 1986 130 & 240 ppm (ref.Exhibit 4.8)

March 25, 1987 104 ppm (ref. Exhibit 4.9)

June 24, 1987 78 ppm (ref. Exhibit 4.9)

The project was totally completed as of June 26, 1987.



State of New Jersey Department of Environmental Protection Division of Waste Management CN 028, Trenton, NJ 08625

Exhibit 4.1

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TICHIGAN DEPARTMENT OF NATURAL RESOURCES

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Exhibit 4.2

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DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

Required under authority of Act 64, RA. 1979, as amended and Act 136, P.A. 1999.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 135, P.A. 1869.

PR 5110

Exhibit 4.2

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MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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Exhibit 4.2

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16. GEN	ERATOR'S CERTIFICATION: I hereby declare	that the contents of this consignment are fully	and accurately	described	above by		
acco	ording to applicable international and national		2			٠	
		been exempted by statute or regulation from the lace to reduce the volume and toxicity of waste (
ble a	and I have selected the method of treatment ronment.	is storage or disposal currently available to me w	hich minimizes	the pres	ent and future th	reat to human	health and the
envii	голыва.				<i>/</i> :	4	Date
Prir	nted/Typed Name	Signature	a L.F	1	as of the		h Day Yei
<u> </u>	nsporter 1 Acknowledgement of Re	excipt of Materials	-90	10	/	71	Date
	nted/Typed Name	Signature	1) 11	-11		Mont	p.Doy/Ye
•••	F P. MillEN	6.1	11/2	1.			13 4
	nsporter 2 Acknowledgement or Re		·			444	Date h Day Ye
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19 Di-	crepancy Indication Space		<u> </u>	,	<u></u>		
	erakanat mananan akasa		•				
	<i>:</i> ·	1.2 A.					
20 5-	Hity Duner or Operator Cartification	of receipt of hazardous materials cover	red by this m	anifest	except as not	ed in	
20. Fac	m 19.	n of receipt of hazardous materials cover					Date
Pri	nted/Typed Name	Signeture				Mont	h Day Ye
	•						<u> 111</u>
							PR 51

GENERATOR 2ND COPY

TABLE 1
TOTAL HYDROCARBON ANALYSIS SUMMARY
FOR UNION SWITCH & SIGNAL
PROJECT NO. 305009

SAMPLE IDENTIFICATION	TOTAL HYDROCARBON
USS-001S	2800
USS-002S	1700
USS-003S	3600
USS-004S	4000
USS-005S	1200
USS-006S	3700
USS-007S	1300
USS-008S	4600
USS-009S	690
USS-010S	1200/740
USS-011S	440
USS-012S	490
USS-013S	780
USS-014S	1100
USS-015S	410
USS-016S	150
USS-017S	240
USS-018S	1500
USS-019S	1000
USS-020S	3200/2400
USS-021S	270

⁽¹⁾mg/kg = milligrams por kilogram or parts per million.

TABLE 2

TOTAL HYDROCARBON ANALYSIS SUMMARY FOR UNION SWITCH & SIGNAL PROJECT NO. 305009

SAMPLE IDENTIFICATION

TOTAL HYDROCARBON mg/2(1)

USS-001W

1.0

 $⁽¹⁾_{mg/\ell}$ = milligrams per liter or parts per million.

TARLE 3

TOTAL HYDROCARBON ANALYSIS SUMMARY OF SOIL SAMPLES FOR UNION SWITCH & SIGNAL PROJECT NO. 305009

SAMPLE IDENTIFICATION	TOTAL HYDROCARBON mg/kg(1)
USS-023S	12
USS-024S	150
USS-025S	20/38(2)
USS-026S	92
USS-027S(A)	160
USS-027S(B)	150
USS-028S	2000
USS-029S	29
USS-030S	1000
USS-031A	1700
USS-031B	20
USS-032	1600/2500
USS-033A	9000
USS-033B	1300
USS-034A	1500
USS-034B	1600
USS-035A	60
USS-035B	. 1200

^{(1)&}lt;sub>mg/kg</sub> = milligrams per kilogram or parts per million.

⁽²⁾ The indicated samples were analyzed in duplicate.

TABLE 4

RESULSTS OF POLYCHLORINATED BIPHENYL (PCB) ANALYSIS OF SOIL SAMPLE FOR UNION SWITCH & SIGNAL PROJECT NO. 305009

PCB CONCENTRATION(1)

SAMPLE IDENTIFICATION

mg/kg(2)

SOURCE AROCLOR(3)

USS-020

<1.0

(3)

⁽¹⁾ Method blanks were consistently <1.0 mg/kg polychlorinated biphenyl.

⁽²⁾ Reported values were not corrected for percent recovery, mg/kg = milligrams per kilogram or parts per million.

⁽³⁾ Indicates when PCBs are detected, the source of the PCB contamination and the commercial aroclor mixture used for quantitation. All samples were screened for Aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260 to determine whether PCBs were present and which aroclor standards were required for instrument calibration.



State Of Ohio Environmental Protection Agency

Northeast District Office 2110 E. Aurora Road; Twinsburg, Ohio 44087-1969

(216) 425-9171

Richard F. Celeste, Governor

Exhibit 4.7

June 30, 1986

RE: SOLID WASTE

MAHONING COUNTY

CENTRAL WASTES LANDFILL

Mr. Dave Tourdof Union Switch & Signal Braddock Avenue Swissvale, Pennsylvania 15218

Dear Mr. Tourdof:

This letter is in response to your correspondence dated June 5, 1986, regarding the proposed disposal of industrial waste at the above-referenced landfill. The waste in question is generated at Union Switch & Signal plant, Swissvale, Pennsylvania and is concrete fuel storage tanks and adjoining soil.

The submitted analysis shows the waste to be nonhazardous under the E.P. Toxicity criteria and the generator has stated that it is not a hazardous or toxic waste under Ohio or Federal regulations. The waste has a minimum solids content of 30% and will be disposed at a rate of 5600 total tons. Having considered the information submitted regarding the waste, this office does not object to its disposal at the Central Wastes, Inc., Landfill provided:

- The generator and landfill operator are fully aware of the Ohio and Federal hazardous waste regulations and they have determined this waste to be nonhazardous.
- The disposal of this waste causes no operational difficulties at the landfill.
- 3. The waste contains no free standing liquids.
- 4. The waste is in a solid state.
- 5. The waste is disposed where the operator specifies.
- 6. The disposal of this waste does not violate any condition of the landfill*s Permit to Install.

We hope this clarifies our position on this matter. Should any questions arise, please do not hesitate to contact this office.

Mach Fachmett

Mark F. Schmidt

Environmental Engineer 3

Division of Solid & Hazardous Waste Management

cc: Mahoning CHD
Ed Kitchen, DSHWM, CO
Central Wastes Landfill
Attn: John Tomci

MFS:mjo

SOLID WASTE DISPOSAL QUESTIONNAIRE Exhibit 4.7 1) Proposed Disposal Facilty: Central Westes, Inc. 2240 S. Union Ave. Alliance .Ohio 44601 2) Generator's Name: Union Switch and Signal Braddock Avenue, Swissvale, PA 15218 3) Mailing Address:___ 4) Phone No.: (412)244-3183 5) Company Contact Dave Tourdot 6) Plant and/or Waste Site Location: Union Switch and Signal, Swissvale, PA 7) Generator's SIC Code(s): 3843 8) Accurate description of the process generating the waste(s):____ Concrete fuel storage tanks and adjoining soil. 3) Is this a hazardous waste as defined by Ohio or Federal regulations? YES x NO. If "YES", Please explain further in an attachment. If this waste is not generated in Ohio, is it considered a hazardous waste in the State it is generated in? __YES \underline{x} NO. If "YES". Please explain further in an attachment. Is this waste regulated under the Federal TOSCA regulations? YES X NO. 10) Has the proposed Waste Disposal Facility been contacted? \underline{X} YES \underline{N} 0. 11) Please attach to this form a copy of a recent (within 6 months) E.P. Toxicity

12) When the waste arrives at the disposal site, will it:(a) be homogeneous?
X YES __NO(b) be stratified?, __YES __XNO(c) contain any free standing liquids?
YES __X NO.
13) Will the waste material be disposed in __X BULK __DRUMS __OTHER(attach explanation)

analysis of a representative sample of the waste in question. Also include the

医环形形成 医二甲甲基磺胺二乙基酚甲酰二乙甲酰二甲酚

minimum percent solids content of the waste.

2 Carlotte C

NORTHEAST DISTRICT OFFICE SOLID WASTE DISPOSAL QUESTIONNAIRE

Exhibit 4.7

	tonsmax. tons/daymax. cubic yards/day. osal project:
mairansporter's name	Wills Trucking, Inc. S: 3185 Columbia Road, Richfield, OH 44286
	No.: (216) 659-9381
•	IT Analytical Services
	io.: (412) 731-8806
. Is the Laboratory co	ertified by either State or Federal EPA? X YES NO.
Certification (To be	e notarized)
I certify that I have	ve personally examined and, am familiar with, the informati
I certify that I have submitted in this are those individuals im	
I certify that I have submitted in this are those individuals important that the submitted in	we personally examined and, am familiar with, the information all attached documents, and that based on my inquiry of mediately responsible for obtaining the information, I belinformation is true, accurate, and complete.
I certify that I have submitted in this are those individuals important that the submitted in	we personally examined and, am familiar with, the information all attached documents, and that based on my inquiry of mediately responsible for obtaining the information, I believed.
I certify that I have submitted in this are those individuals important that the submitted in	we personally examined and, am familiar with, the information all attached documents, and that based on my inquiry of mediately responsible for obtaining the information, I belinformation is true, accurate, and complete.
I certify that I have submitted in this are those individuals important that the submitted in SIGNATURE	we personally examined and, am familiar with, the information all attached documents, and that based on my inquiry of mediately responsible for obtaining the information, I belinformation is true, accurate, and complete. Sivadam DATE 5-29-86
I certify that I have submitted in this are those individuals important that the submitted in SIGNATURE	ve personally examined and, am familiar with, the information all attached documents, and that based on my inquiry of mediately responsible for obtaining the information, I belinformation is true, accurate, and complete. Sivadana DATE 5-29-86 V. K. Srivastava
I certify that I have submitted in this are those individuals important that the submitted in SIGNATURE	ve personally examined and, am familiar with, the information of all attached documents, and that based on my inquiry of mediately responsible for obtaining the information, I belinformation is true, accurate, and complete. Sivadan DATE 5-29-86 V. K. Srivastava IT Corporation 10 Duff Road
I certify that I have submitted in this are those individuals important that the submitted in SIGNATURE	ve personally examined and, am familiar with, the information all attached documents, and that based on my inquiry of mediately responsible for obtaining the information, I be information is true, accurate, and complete. Sivadan DATE 5-29-86 V. K. Srivastava IT Corporation

Aurora Road, Twinsburg, Ohio 44087 • (216) 425-9171



Laboratory Services Division 5350 Campbells Run Road Pittsburgh, PA 15205

REMIT TO: Park West Two **Cliff Mine Road** Pittsburgh, PA 15275

412-788-1080

Exhibit 4.8

ANALYSIS REPORT ... LAB

CLIENT NAME:

UNION SHITCH & SIGNAL

ADDRESS:

1789 SOUTH BRADDOCK AVENUE

SHISSVALE

NUS CLIENT NO: 340801

VENDOR NOT

05765200

MORIC ORDER NOT

55830

REPORT DATE: 08/26/86

DATE RECEIVED:

08/15/66

ATTENTION:

MR. DAVE TOURDET

NUS SAMPLE NO -

RESULTS

UNITS

SAMPLE IDENTIFICATION

08/08 \$1

16080761

COMPOSITE SOIL SAMPLE

Hydrocarbon IR Scan

DM75 Hadrocarbon Ik Scan

COMPOSITE SOIL SAMPLE

08/08 #2

16000762

240

130

PPE

COMMENTS:

PTL - INSPECTORATE INC.



PITTEBURGH DISTRICT

60 1004 (A) 1014 (5) 1000 SHUHOH PENNON (6) ANY 6 00 110 412 922 4000 14× 412 922 4004

REPORT

Laboratory No. 887828 Client No. S78857-0 ORDER NO. PCH-530
July 24, 1987

Client

Union Switch and Signal Division

American Standard Inc.

1789 South Braddock Avenue

Swissvale, PA 15218

Sample Description

Two (2) Jars of Soil

Identified as 3/25/87 and 6/24/87

Submitted By

Client

Submitted To

PTL-Inspectorate Inc., Chemical Department

Method of Test

Standard Methods, 16th Edition, Method No. 503

Infrared Spectroscopy

Reported To

Union Switch and Signal Division

Attention: M. D. Tourdot

Two jars of soil, identified by the client as "3/25/87 Soil" and "6/24/87 Soil", were submitted to this laboratory for determination of the presence of hydrocarbon oil.

The samples were dried and extracted according to Standard Methods, 16th Edition, Method No. 503. Quantitative evaporation and extraction of the samples with trichlorotrifluoroethane resulted in the following:

Sample Identification	Solids Content (Weight Percent)	Water Content (Weight Percent)	Trichlorotrifluoroethane Solubles (ppm, calculated on Dry Solids Basis)
3/25/87 Soil	85.5	14.5	104
6/24/87 Soil	88.6	11.4	78

Darion Switch and Signal Div. July 24, 1987
Page 2 of 2

Order No. PCH-530 Lab. No. 887828

The trichlorotrifluoroethane solubles were examined using infrared spectral procedures for identification with the following results:

Sample Identification

Composition of Trichlorotrifluoroethane Solubles

3/25/87 Soil 6/24/87 Soil

Petroleum hydrocarbon oil Petroleum hydrocarbon oil

Prepared By:

Darlan Altrigan

Barbara A. Higgins Senior Chemist/Spectroscopist Reviewed and Approved By:

William S. Carlson, Manager Chemical Department

2-Client

bmm/ear